

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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U.S. DEPT. OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF OBJECTION  
TO INTERROGATORY OCA/USPS-307  
(January 16, 2002)


The Postal Service hereby moves for late acceptance of its objection to interrogatory OCA/USPS-307, filed on December 14, 2001. The objection is late for several reasons, beginning with administrative oversight, the need to coordinate with individuals who have been on extended travel and away for the holidays, confusion engendered by simultaneous hearings on one set of witnesses, ongoing discovery regarding others, settlement discussions with both clients and participants in this docket, and the fact that the interrogatory was not proper follow-up as implicitly claimed by the interrogatory. Further discussion of the reasons for the late-filed objection also appears in the body of the objection.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

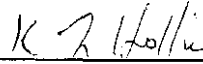
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Kenneth N. Hollies

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "K N Hollies", is written above a horizontal line.

Kenneth N. Hollies

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January 16, 2002